



## Notice of Service of Process

Transmittal Number: 23660341  
Date Processed: 08/20/2021

**Primary Contact:** Steven Ughy  
UGI Corporation  
460 N Gulph Rd  
King of Prussia, PA 19406-2815

**Electronic copy provided to:** Mary Banks

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**Entity:** AmeriGas Propane GP, LLC  
Entity ID Number 3988122

**Entity Served:** Amerigas Propane, Gp, LLC

**Title of Action:** Rico Khan, vs. Amerigas Propane, Gp, LLC

**Document(s) Type:** Summons/Complaint

**Nature of Action:** Personal Injury

**Court/Agency:** Cook County Circuit Court, IL

**Case/Reference No:** 2021L007259

**Jurisdiction Served:** Illinois

**Date Served on CSC:** 08/19/2021

**Answer or Appearance Due:** 30 Days

**Originally Served On:** CSC

**How Served:** Personal Service

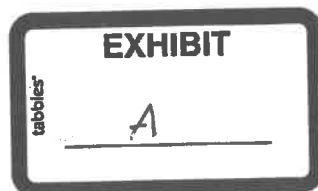
**Sender Information:** The Kryder Law Group, LLC  
312-223-1700

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2420 - Served By Publication 2421 - Served By Publication

Summons - Alias Summons

(03/15/21) CCG 0001 A

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Name all Parties

RICO KHAN

Plaintiff(s)

v.

AMERIGAS PROPANE, GP, LLC, et al.

Defendant(s)

Case No. 2021 L 007259

Address of Defendant(s)

Please serve as follows (check one): ☐ Certified Mail ☐ Sheriff Service ☒ Alias

## SUMMONS

To each Defendant:

You have been named a defendant in the complaint in this case, a copy of which is hereto attached. You are summoned and required to file your appearance, in the office of the clerk of this court, within 30 days after service of this summons, not counting the day of service. If you fail to do so, a judgment by default may be entered against you for the relief asked in the complaint.

## THERE IS A FEE TO FILE YOUR APPEARANCE.

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Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois

[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)

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**Summons - Alias Summons**

(03/15/21) CCG 0001 B

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**FEE WAIVER:** If you are unable to pay your court fees, you can apply for a fee waiver. For information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to [www.illinoislegalaid.org](http://www.illinoislegalaid.org). You can also ask your local circuit clerk's office for a fee waiver application.

**COURT DATE:** Your court date will be sent to your e-File email account or the email address you provided to the clerk's office. You can also call or email the clerk's office to request your next court date. You will need to provide your case number OR, if unknown, the name of the Plaintiff or Defendant. For criminal case types, you will also need to provide the Defendant's birthdate.

**REMOTE APPEARANCE:** You may be able to attend this court date by phone or video conference.

This is called a "Remote Appearance". Call the Circuit Clerk at (312) 603-5030 or visit their website at [www.cookcountyclerkofcourt.org](http://www.cookcountyclerkofcourt.org) to find out how to do this.

Contact information for each of the Clerk's Office locations is included with this summons. The Clerk's office is open Mon - Fri, 8:30 am - 4:30 pm, except for court holidays.

To the officer: (Sheriff Service)

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8/16/2021 10:38 AM IRIS Y. MARTINEZ

☒ Atty. No.: 38274  
☐ Pro Se 99500

Witness date \_\_\_\_\_

Name: The Kryder Law Group, LLC.

Atty. for (if applicable):

Plaintiff

Iris Y. Martinez, Clerk of Court

☐ Service by Certified Mail: \_\_\_\_\_

Address: 134 North LaSalle, Suite 1515

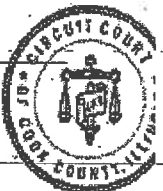
City: Chicago

State: IL Zip: 60602

Telephone: (312) 223-1700

Primary Email: Info@Kryderlaw.com

☐ Date of Service: \_\_\_\_\_  
 (To be inserted by officer on copy left with employer or other person)



Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois

[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)



## Notice of Service of Process

null / ALL  
Transmittal Number: 23663308  
Date Processed: 08/20/2021

**Primary Contact:** Steven Ughy  
UGI Corporation  
460 N Gulph Rd  
King of Prussia, PA 19406-2815

**Electronic copy provided to:** Mary Banks

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**Entity:** AmeriGas Eagle Holdings, Inc.  
Entity ID Number 2082279

**Entity Served:** Amerigas Eagle Holdings, Inc.

**Title of Action:** Rico Khan vs. Amerigas Propane Gp, LLC

**Document(s) Type:** Summons/Complaint

**Nature of Action:** Personal Injury

**Court/Agency:** Cook County Circuit Court, IL

**Case/Reference No:** 2021L007259

**Jurisdiction Served:** Illinois

**Date Served on CSC:** 08/19/2021

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Summons - Alias Summons

(03/15/21) CCG 0001 A

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Name all Parties

RICO KHAN

Plaintiff(s)

v.

AMERIGAS PROPANE, GP, LLC., et al.

Case No. 2021 L 007259

Defendant(s)

Amerigas Eagle Holdings, Inc.

Address of Defendant(s)

Please serve as follows (check one): ☐ Certified Mail ☐ Sheriff Service ☒ Alias

## SUMMONS

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Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois

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## Summons - Alias Summons

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8/16/2021 10:38 AM IRIS Y. MARTINEZ

☉ Atty. No.: 38274  
○ Pro Se 99500

Witness date \_\_\_\_\_

Name: The Kryder Law Group, LLC...

Atty. for (if applicable):

Iris Y. Martinez, Clerk of Court.

Plaintiff

☐ Service by Certified Mail: \_\_\_\_\_

Address: 134 North LaSalle, Suite 1515

☐ Date of Service: \_\_\_\_\_  
(To be inserted by officer on copy left with employer or other person)

City: Chicago

State: IL Zip: 60602

Telephone: (312) 223-1700

Primary Email: Info@Kryderlaw.com



Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois  
[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)



## Notice of Service of Process

Transmittal Number: 23663318  
Date Processed: 08/20/2021

**Primary Contact:** Steven Ughy  
UGI Corporation  
460 N Gulph Rd  
King of Prussia, PA 19406-2815

**Electronic copy provided to:** Mary Banks

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**Entity:** Amerigas Propane Parts & Service, Inc.  
Entity ID Number 1662538

**Entity Served:** Amerigas Propane Parts & Service, Inc.

**Title of Action:** Rico Khan vs. Amerigas Propane Gp, LLC

**Document(s) Type:** Summons/Complaint

**Nature of Action:** Personal Injury

**Court/Agency:** Cook County Circuit Court, IL

**Case/Reference No:** 2021L007259

**Jurisdiction Served:** Illinois

**Date Served on CSC:** 08/19/2021

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Name all Parties

RICO KHAN

Plaintiff(s)

v.

AMERIGAS PROPANE, GP, LLC., et al.

Case No. 2021 L 007259

Amerigas Propane Parts & Service, Inc. Defendant(s)

Address of Defendant(s)

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(03/15/21) CCG 0001 B

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8/16/2021 10:38 AM IRIS Y. MARTINEZ

☒ Atty. No.: 38274  
☐ Pro Se 99500

Witness date \_\_\_\_\_

Name: The Kryder Law Group, LLC.

Atty. for (if applicable):

Iris Y. Martinez, Clerk of Court

Plaintiff

☐ Service by Certified Mail: \_\_\_\_\_

Address: 134 North LaSalle, Suite 1515

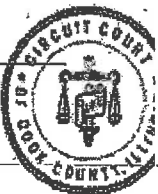
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City: Chicago

State: IL Zip: 60602

Telephone: (312) 223-1700

Primary Email: Info@Kryderlaw.com



Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois  
[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)

FILED  
7/19/2021 12:00 AM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
14080012

STATE OF ILLINOIS )  
 )SS.  
COUNTY OF COOK )

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

RICO KHAN,

Plaintiff,

v.

Case No.: 2021L007259

AMERIGAS PROPANE GP, LLC.;  
AMERIGAS EAGLE HOLDINGS, INC.;  
AMERIGAS PROPANE PARTS &  
SERVICE, INC.;

Defendants.

COMPLAINT

NOW COMES the Plaintiff, RICO KHAN, by and through his attorneys, THE KRYDER LAW GROUP, LLC., and complains of the Defendants, AMERIGAS PROPANE GP, LLC; AMERIGAS EAGLE HOLDINGS, INC.; and AMERIGAS PROPANE PARTS & SERVICE, INC., and in support thereof states as follows:

1. On or about November 4, 2019, Defendant, AMERIGAS PROPANE GP, LLC, was a corporation licensed to do business in the State of Illinois and was in the commercial propane industry.

2. On or about November 4, 2019, Defendant, AMERIGAS EAGLE HOLDINGS, INC., was a corporation licensed to do business in the State of Illinois and was in the commercial propane industry.

3. On or about November 4, 2019, Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., was a corporation licensed to do business in the State of

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Illinois and was in the commercial propane industry.

4. On November 4, 2019, Power Solutions International, Inc., was an Illinois Corporation doing business in the State of Illinois and was in the business of providing engines and power systems to vendors within the State of Illinois.

5. On November 4, 2019, Power Solutions International, Inc., owned, operated, and maintained the premises located at 201 Mittel Drive in Wood Dale, Illinois, which housed a large industrial factory.

6. On November 4, 2019, Defendant, AMERIGAS PROPANE GP, LLC, by and through its employees/ agents, contracted with Power Solutions International, Inc., to manufacture, deliver, and maintain propane tanks.

7. On November 4, 2019, Defendant, AMERIGAS EAGLE HOLDINGS, INC., by and through its employees/ agents, contracted with Power Solutions International, Inc., to manufacture, deliver, and maintain propane tanks.

8. On November 4, 2019, Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., by and through its employees/ agents, contracted with Power Solutions International, Inc., to manufacture, deliver, and maintain propane tanks.

9. On November 4, 2019, the aforementioned Power Solutions International, Inc., premises consisted of a large industrial building that housed a metal cage where propane tanks were stored.

10. On November 4, 2019, Defendant, AMERIGAS PROPANE GP, LLC, was responsible for the manufacture, delivery, maintenance, and upkeep of the propane tanks that were delivered to Power Solutions International, Inc.

11. On November 4, 2019, Defendant, AMERIGAS EAGLE HOLDINGS, INC.,

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was responsible for the manufacture, delivery, maintenance, and upkeep of the propane tanks that were delivered to Power Solutions International, Inc.

12. On November 4, 2019, Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., was responsible for the manufacture, delivery, maintenance, and upkeep of the propane tanks that were delivered to Power Solutions International, Inc.

13. On November 4, 2019, and at all times material, the Plaintiff, RICO KHAN, was employed with Power Solutions International, Inc., as a product tester.

14. On November 4, 2019, Plaintiff, RICO KHAN, was lifting a propane tank from its designated, caged area when the tank malfunctioned due to a missing and/or damaged O-ring and released propane directly onto his hands.

15. On November 4, 2019, and at all times material, Defendant, AMERIGAS PROPANE GP, LLC, by and through its agents, servants, and/or employees, had the duty to exercise ordinary care in the manufacturing, delivery, maintenance, and upkeep of its propane tanks.

16. On November 4, 2019, and at all times material, Defendant, AMERIGAS EAGLE HOLDINGS, INC., by and through its agents, servants, and/or employees, had the duty to exercise ordinary care in the manufacturing, delivery, maintenance, and upkeep of its propane tanks.

17. On November 4, 2019, and at all times material, Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., by and through its agents, servants, and/or employees, had the duty to exercise ordinary care in the manufacturing, delivery, maintenance, and upkeep of its propane tanks.

18. At all times material, Plaintiff, RICO KHAN, was free of fault and contributory

negligence.

**COUNT I – RICO KHAN v. AMERIGAS PROPANE GP, LLC.**

19. Plaintiff realleges and incorporates paragraphs 1-18 as though fully restated herein.

20. At the time and place aforesaid, Defendant, AMERIGAS PROPANE GP, LLC., by and through its agents and/or employees, then and there breached the aforementioned duty through one or more of the following acts and/or omissions:

- a. Carelessly and negligently, manufactured a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- b. Carelessly and negligently delivered a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- c. Carelessly and negligently, maintained a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry knowing, of the danger it posed to those handling the tanks;
- d. Carelessly and negligently, manufactured a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- e. Carelessly and negligently, delivered a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- f. Carelessly and negligently maintained a propane tank that had a missing

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and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;

g. Carelessly and negligently, failed to inspect its propane tanks for malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, prior to delivering the tank despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;

h. Carelessly and negligently, failed to routinely inspect the propane tanks it delivered to its customers, including Power Solutions International, Inc., for malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;

i. Carelessly and negligently failed to train its employees in inspecting propane tanks for malfunctioning, defective and/or hazardous conditions, including missing and/or damaged O-rings, prior to delivery; and

j. Carelessly and negligently failed to train its employees to routinely inspect the propane tanks for malfunctioning , defective and/or hazardous conditions, including missing and/or damaged O-ring, prior to delivery.

21. As a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, AMERIGAS PROPANE GP, LLC., the Plaintiff, RICO KHAN, then and there sustained severe and permanent bodily injury and was, and will be, hindered and prevented from attending to his usual duties and affairs of life, and has lost, and will continue to lose, the value of that time as aforementioned. Further, Plaintiff, RICO KHAN, suffered

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great pain and anguish, both in mind and body, and will in the future continue to suffer. The Plaintiff, RICO KHAN, further expended and became liable for large sums of money for medical care and services and will in the future expend money for medical care and services endeavoring to become healed and cured of said injuries.

WHEREFORE, the Plaintiff, RICO KHAN, demands judgment against the Defendant, AMERIGAS PROPANE GP, LLC., in a sum greater than \$50,000.00 (Fifty Thousand Dollars) plus costs of this case and any additional relief this Court deems fair and just.

**COUNT II – RICO KHAN v. AMERIGAS EAGLE HOLDINGS, INC.**

22. Plaintiff realleges and incorporates paragraphs 1-18 as though fully restated herein.

23. At the time and place aforesaid, Defendant, AMERIGAS EAGLE HOLDINGS, INC., by and through its agents and/or employees, then and there breached the aforementioned duty through one or more of the following acts and/or omissions:

- a. Carelessly and negligently, manufactured a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- b. Carelessly and negligently delivered a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- c. Carelessly and negligently, maintained a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry knowing, of the danger it posed to those handling the tanks;



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- d. Carelessly and negligently, manufactured a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- e. Carelessly and negligently, delivered a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- f. Carelessly and negligently maintained a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- g. Carelessly and negligently, failed to inspect its propane tanks for malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, prior to delivering the tank despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;
- h. Carelessly and negligently, failed to routinely inspect the propane tanks it delivered to its customers, including Power Solutions International, Inc., for malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;
- i. Carelessly and negligently failed to train its employees in inspecting propane tanks for malfunctioning, defective and/or hazardous conditions, including missing and/or damaged O-rings, prior to delivery; and
- j. Carelessly and negligently failed to train its employees to routinely inspect the

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propane tanks for malfunctioning, defective and/or hazardous conditions, including missing and/or damaged O-ring, prior to delivery.

24. As a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, AMERIGAS EAGLE HOLDINGS, INC., the Plaintiff, RICO KHAN, then and there sustained severe and permanent bodily injury and was, and will be, hindered and prevented from attending to his usual duties and affairs of life, and has lost, and will continue to lose, the value of that time as aforementioned. Further, Plaintiff, RICO KHAN, suffered great pain and anguish, both in mind and body, and will in the future continue to suffer. The Plaintiff, RICO KHAN, further expended and became liable for large sums of money for medical care and services and will in the future expend money for medical care and services endeavoring to become healed and cured of said injuries.

WHEREFORE, the Plaintiff, RICO KHAN, demands judgment against the Defendant, AMERIGAS EAGLE HOLDINGS, INC., in a sum greater than \$50,000.00 (Fifty Thousand Dollars) plus costs of this case and any additional relief this Court deems fair and just.

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**COUNT III – RICO KHAN v. AMERIGAS PROPANE PARTS & SERVICE, INC.**

25. Plaintiff realleges and incorporates paragraphs 1-18 as though fully restated herein.
26. At the time and place aforesaid, Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., by and through its agents and/or employees, then and there breached the aforementioned duty through one or more of the following acts and/or omissions:
- a. Carelessly and negligently, manufactured a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry,

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knowing of the danger it posed to those handling the tanks;

b. Carelessly and negligently delivered a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;

c. Carelessly and negligently, maintained a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry knowing, of the danger it posed to those handling the tanks;

d. Carelessly and negligently, manufactured a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;

e. Carelessly and negligently, delivered a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;

f. Carelessly and negligently maintained a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;

g. Carelessly and negligently, failed to inspect its propane tanks for malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, prior to delivering the tank despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;

h. Carelessly and negligently, failed to routinely inspect the propane tanks it delivered to its customers, including Power Solutions International, Inc., for

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malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;

- i. Carelessly and negligently failed to train its employees in inspecting propane tanks for malfunctioning, defective and/or hazardous conditions, including missing and/or damaged O-rings, prior to delivery; and
- j. Carelessly and negligently failed to train its employees to routinely inspect the

propane tanks for malfunctioning, defective and/or hazardous conditions, including missing and/or damaged O-ring, prior to delivery.

27. As a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., the Plaintiff, RICO KHAN, then and there sustained severe and permanent bodily injury and was, and will be, hindered and prevented from attending to his usual duties and affairs of life, and has lost, and will continue to lose, the value of that time as aforementioned. Further, Plaintiff, RICO KHAN, suffered great pain and anguish, both in mind and body, and will in the future continue to suffer. The Plaintiff, RICO KHAN, further expended and became liable for large sums of money for medical care and services and will in the future expend money for medical care and services endeavoring to become healed and cured of said injuries.

WHEREFORE, the Plaintiff, RICO KHAN, demands judgment against the Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., in a sum greater than \$50,000.00 (Fifty Thousand Dollars) plus costs of this case and any additional relief this Court deems fair and just.

Respectfully Submitted:

By: /s/ ALEXANDER GERTEIS  
One of Plaintiff's Attorneys

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